

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

KENDALL RAYE ROGERS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C. A. No. 05-721-KAJ
	)	
STATE OF DELAWARE,	)	
DEPARTMENT OF PUBLIC SAFETY/	)	
DMV,	)	
	)	
Defendants,	)	

**DEFENDANT’S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**  
**DIRECTED TO PLAINTIFF**

Now comes Defendant, State of Delaware, pursuant to Fed. R. Civ. Pro. 34, who requests that Plaintiff produce the following documents within thirty days:

**DOCUMENTS REQUESTED**

1. All documents identified in Plaintiff’s Rule 26 Initial Disclosures.  
RESPONSE:
  
2. Original personnel files regarding Plaintiff.  
RESPONSE:
  
3. All documents provided to or received from the Equal Employment Opportunity Commission.  
RESPONSE:
  
4. Any written statements taken by Plaintiff referring or relating to Defendant and the allegations in the Complaint.  
RESPONSE:

5. Any documents Plaintiff intends to use at any depositions or at trial.

RESPONSE:

6. Any documents referring or relating to allegations set out in the Complaint.

RESPONSE:

7. Any documents referring or relating to complaints made by Mr. Rogers, formal or informal, relating to the work environment, or complaints made by others relating to the work environment.

RESPONSE:

8. Any documents provided to or received from any expert that Plaintiff intends to call as an expert witness at trial.

RESPONSE:

9. All documents referring or relating to or recording your answers to Defendant's First Set of Interrogatories.

RESPONSE:

STATE OF DELAWARE  
DEPARTMENT OF TRANSPORTATION

/s/ Frederick H. Schranck  
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Dated: July 13, 2006